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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	<b>2:12-CR-00004-JCM-GWF</b>
	)	
Plaintiff,	)	
	)	<b>STIPULATION FOR PROTECTIVE ORDER</b>
vs.	)	
	)	
DEFENDANT [1] <i>et al.</i> ,	)	
	)	
	)	
Defendants.	)	

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IT IS HEREBY STIPULATED AND AGREED between the parties, DANIEL G. BOGDEN, United States Attorney for the District of Nevada, and Kimberly M. Frayn and Andrew W. Duncan, Assistant United States Attorneys, counsel for the United States, and Todd Leaventhal, Esq. Counsel for Alexander Kostyukov, Defendant [3]; Robert M. Draskovich, Jr., Esq. Counsel for Maceo Boozer, III, Defendant [4]; Randall J. Roske, Esq., Counsel for Edward Montecalvo Defendant [6]; Jonathan Powell, Esq., Counsel for Jermaine Smith, Defendant [9]; Kalani K. Hoo, Esq., Counsel for Qasir Mukhtar, Defendant [15]; Michael J. Miceli, Esq., Counsel for Michael Lofton, Defendant [21]; Angela H. Dows, Esq., Counsel for Shiyang Gou, Defendant [22]; John J. Momot, Jr., Esq., Counsel for Duvaughn Butler, Defendant [26]; and Bret O. Whipple, Esq. Counsel for Fredrick Thomas, Defendant [27], that this Court issue an Order

1 protecting from disclosure to the public any discovery materials or documents containing the  
2 personal identifying information and financial identifying information such as, names, social  
3 security numbers, drivers license numbers, dates of birth, addresses, mothers' maiden names,  
4 passwords, debit card and credit card account numbers, financial lines of credit account numbers,  
5 bank account numbers, and Personal Identification Numbers (PINs), of participants, witnesses and  
6 victims in this case. Such materials and documents shall be referred to hereinafter as "Protected  
7 Materials." The parties state as follows:

8           1. Protected Materials which may be used by the government in its case in chief  
9 include personal and financial identifiers, including names, social security numbers, drivers  
10 license numbers, dates of birth, addresses, mothers' maiden names, passwords, debit card and  
11 credit card account numbers, financial lines of credit account numbers, bank account numbers, and  
12 Personal Identification Numbers (PINs), of participants, witnesses, and victims in this case.

13           2. Discovery in this case is voluminous and many of these materials and documents  
14 include personal and financial identifiers. Redacting the personal and financial identifiers of  
15 participants, witnesses, and victims would prevent the timely disclosure of discovery to the  
16 defendants.

17           3. The United States agrees to provide Protected Materials without redacting the  
18 personal and financial identifiers of participants, witnesses, and victims

19           4. Access to Protected Materials will be restricted to persona authorized by the Court,  
20 namely defendants, attorneys of record and attorneys, paralegals, investigators, experts, and  
21 secretaries employed by the attorneys of record and performing on behalf of defendants.

22           5. The following restrictions will be placed on the defendants, defendants' attorneys  
23 and the above-designated individuals unless and until further ordered by the Court. Defendants,  
24 defendants' attorneys and the above-designated individuals shall not:

25           a. make copies for, or allow copies of any kind to be made by any other person  
26 of Protected Materials;

/s/ Kimberly M. Frayn  
KIMBERLY M. FRAYN  
ANDREW W. DUNCAN  
Assistant United States Attorneys

/s/ Todd Leaventhal, Esq.  
Todd Leaventhal, Esq.  
Counsel for Alexander Kostyukov, Defendant [3]

/s/Robert M. Draskovich, Jr., Esq.  
Robert M. Draskovich, Jr., Esq.  
Counsel for Maceo Boozer, III, Defendant [4]

4/19/12  
DATE

1 /s/ Randall J. Roske, Esq. 4/19/12  
Randall J. Roske, Esq., DATE  
2 Counsel for Edward Montecalvo Defendant [6]

3 /s/ Jonathan Powell, Esq. 4/19/12  
Jonathan Powell, Esq., DATE  
4 Counsel for Jermaine Smith, Defendant [9]  
5

6 /s/Kalani K. Hoo, Esq. 4/19/12  
Kalani K. Hoo, Esq., DATE  
7 Counsel for Qasir Mukhtar, Defendant [15]

8 /s/ Michael J. Miceli, Esq. 4/19/12  
Michael J. Miceli, Esq., DATE  
9 Counsel for Michael Lofton, Defendant [21]  
10

11 /s/ Angela H. Dows, Esq. 4/19/12  
Angela H. Dows, Esq., DATE  
12 Counsel for Shiyang Gou, Defendant [22]

13 /s/ John J. Momot, Jr., Esq. 4/19/12  
John J. Momot, Jr., Esq., DATE  
14 Counsel for Duvaughn Butler Defendant [26]  
15

16 /s/ Bret O. Whipple, Esq. 4/19/12  
Bret O. Whipple, Esq., DATE  
17 Counsel for Fredrick Thomas, Defendant [27]  
18  
19  
20

**ORDER**

21 IT IS SO ORDERED this 24th day of April 2012.  
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23   
24 UNITED STATES MAGISTRATE JUDGE  
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